

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

LA UNIÓN DEL PUEBLO ENTERO, et al., <i>Plaintiffs,</i> v.  GREGORY W. ABBOTT, et al., <i>Defendants.</i>	5:21-cv-844-XR
OCA-GREATER HOUSTON, et al., <i>Plaintiffs,</i> v.  JOSE A. ESPARZA, et al., <i>Defendants.</i>	1:21-cv-0780-XR
HOUSTON JUSTICE, et al., <i>Plaintiffs,</i> v.  GREGORY WAYNE ABBOTT, et al., <i>Defendants.</i>	5:21-cv-0848-XR
LULAC TEXAS, et al., <i>Plaintiffs,</i> v.  JOSE EXPARZA, et al., <i>Defendants.</i>	1:21-cv-0786-XR
MI FAMILIA VOTA, et al., <i>Plaintiffs,</i> v.  GREG ABBOTT, et al., <i>Defendants.</i>	5:21-cv-0920-XR

**PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION**

Pursuant to Federal Rules of Civil Procedure 26 and 34, Plaintiffs in the above-captioned actions, collectively, serve these Requests for Production upon Defendant Kenneth Paxton, in his official capacity as the Texas Attorney General.

Responses to these Requests are to be produced to Graham White within 30 days of receipt. To arrange for electronic production, please contact Mr. White at [gwhite@elias.law](mailto:gwhite@elias.law). Anything that cannot be produced electronically should be produced to Mr. White at Elias Law Group LLP, 10 G Street NE, Suite 600, Washington, D.C. 20002.

Each Request for Production is subject to the Definitions and Instructions listed below.

**DEFINITIONS**

Except as specifically defined below, the terms used in this request shall be construed and defined in accordance with the Federal Rules of Civil Procedure and the Local Rules of the U.S. District Court for the Western District of Texas, wherever applicable. Any terms not defined shall be given their ordinary meaning.

1. “2020 Ballot Fraud Intervention Team” means the Ballot Fraud Intervention Team established by the Texas Attorney General’s Office in 2020.
2. “2021 Election Integrity Unit” refers to the 2021 Texas Election Integrity Unit established by the Texas Attorney General’s Office in 2021.
3. “24-hour voting” means any method of voting at polling places between the hours of 7:00 p.m. and 7:00 a.m.
4. “Any” or “all” mean “any and all.”
5. “Communication” is synonymous in meaning and scope to the term “communication” as used in Local Rule 26, and includes any transfer of information of any type, whether written, oral, electronic, or otherwise, and includes transfers of information via email,

report, letter, text message, voicemail message, written memorandum, note, summary, and other means.

6. “Curbside voting” means, as defined in Tex. Elec. Code § 64.009, any method of voting where a voter, who is physically unable to enter the polling place without personal assistance or likelihood of injuring the voter's health, request that an election officer deliver a ballot to the voter at the polling place entrance or curb.

7. “Date” means the exact day, month, and year, if ascertainable, or, if not, the best available approximation (including relationship to other events).

8. “Demographics” means characteristics relating to the population or groups within the population and, as used herein, expressly includes but is not limited to race, age, and gender.

9. “Document” is synonymous in meaning and scope to the term “document” as used in Federal Rule of Civil Procedure 34 and Local Rule 26 and includes, but is not limited to, records, reports, lists, data, statistics, summaries, analyses, communications (as defined above), computer discs, tapes, printouts, emails, databases, and any handwritten, typewritten, printed, electronically recorded, taped, graphic, machine-readable, or other material, of whatever nature and in whatever form, including all non-identical copies and drafts thereof, and all copies bearing any notation or mark not found on the original.

10. “Drive-thru voting” means any method of voting in which a voter casts a ballot from inside a motor vehicle.

11. “Drop box voting” means any method of voting in which a voter casts a ballot by depositing their ballot in a ballot box located outside of a polling place.

12. “Early voting” means any method of voting that occurs prior to the uniform election date for a primary or general election.

13. “Including” means including, but not limited to.

14. “Person” means not only natural persons, but also firms, partnerships, associations, corporations, subsidiaries, divisions, departments, joint ventures, proprietorships, syndicates, trust groups, and organizations; federal, state, and local governments or government agencies, offices, bureaus, departments, or entities; other legal, business, or government entities; and all subsidiaries, affiliates, divisions, departments, branches, and other units thereof or any combination thereof.

15. “SB 1” means the legislation designated as Senate Bill 1, titled “Relating to election integrity and security, including by preventing fraud in the conduct of elections in this state; increasing criminal penalties; creating criminal offenses,” that was enacted during the 87th Second Called Session of the Texas Legislature and signed by the Governor of Texas on September 7, 2021, including any predecessor or related bills from any legislative session in 2021.

16. “SB 7” means the legislation designated as Senate Bill 7, titled “Relating to election integrity and security, including by preventing fraud in the conduct of elections in this state; increasing criminal penalties; creating criminal offenses,” that was introduced during the 87th Regular Session of the Texas Legislature, including any predecessor or related bills from any legislative session in 2021.

17. “HB 3” means the legislation designated as House Bill 3, titled “Relating to election integrity and security, including by preventing fraud in the conduct of elections in this state; increasing criminal penalties; creating criminal offenses,” that was introduced during the 87th First Called Session of the Texas Legislature, including any predecessor or related bills from any legislative session in 2021.

18. “HB 6” means the legislation designated as House Bill 6, titled “Relating to election integrity and security, including by preventing fraud in the conduct of elections in this state;

increasing criminal penalties; creating criminal offenses,” that was introduced during the 87th Regular Session of the Texas Legislature, including any predecessor or related bills from any legislative session in 2021.

19. “Straight-ticket voting” means any method of voting in which a voter may select a political party’s candidates in one motion or gesture.

20. “Texas Legislature” means the members and staff of the Texas Senate and Texas House of Representatives.

21. “Voter” means any registered voter in Texas and all persons who may properly register to vote in Texas by the close of discovery in this case.

22. “Vote-by-mail” means any method of voting in which a voter casts a ballot received in the mail.

23. “Vote harvesting” means, as defined in SB 1, an in-person interaction with one or more voters, in the presence of the ballot or during the voting process, intended to deliver votes for a specific candidate or measure.

24. “You” and “your” means Texas Attorney General Kenneth Paxton, and his office, including its employees, staff, agents, and representatives.

## **INSTRUCTIONS**

1. You shall produce materials and serve responses and any objections within 30 days after service of these Requests for Production.

2. If you object to any part of a request, set forth the basis of your objection and respond to all parts of the request to which you do not object. Any ground not stated in a timely objection is waived.

3. If, in responding to these Requests for Production, you encounter any ambiguities when construing a request or definition, set forth the matter deemed ambiguous and the construction used in responding.

4. Regarding any document withheld from production on a claim of privilege or work product protection, provide a written privilege log identifying each document individually and containing all information required by Federal Rule of Civil Procedure 26(b)(5), including a description of the basis of the claimed privilege and all information necessary for Plaintiff to assess the claim of privilege.

5. Produce all documents available to you or subject to your access or control that are responsive to the following document production topics. This includes documents in your actual or constructive possession or control and in the actual or constructive possession or control of your attorneys, investigators, experts, and anyone else acting on your behalf.

6. Documents are to be produced as they are kept in the ordinary course of business. Accordingly, documents should be produced in their entirety, without abbreviation, redaction, or expurgation; file folders with tabs or labels identifying documents responsive to this subpoena should be produced intact with the documents; and documents attached to each other should not be separated.

7. All documents are to be produced in electronic form. All documents including emails, should be produced in single page TIFF format, showing comments and track changes where applicable, with text extract and load files containing standard fielded information and metadata. TIFF images shall be placed in an Images folder with any given subfolder not to exceed 5,000 images per folder and accompanied by an .opt placed in a Data folder. Each page of a document should be assigned a unique production number (aka Bates number) electronically

“burned” onto the image at allocation that does not unreasonably conceal or interfere with information on the document. The number should be consistent across the production, contain no special characters, and be numerically sequential within a given document. Attachments to documents should be assigned numbers that directly follow in sequential order the Bates numbers on the documents to which they were attached. If a number or set of numbers is skipped, the skipped number or set of numbers should be noted, for example with a placeholder.

8. Each request and subparagraph thereof are to be answered separately. To the extent that you do not have any documents reflecting the information requested herein, and/or any means of recording the information requested herein, please so indicate in your response to the specific production request.

9. Each document produced should be categorized by the number of the document request in response to which it is produced.

10. If any otherwise responsive document was, but is no longer, in existence or in your possession, custody, or control, identify the type of information contained in the document, its current or last known custodian, the location/address of such document, and the identity of all persons having knowledge or who had knowledge of the document, and also describe in full the circumstances surrounding its disposition from your possession or control.

11. These Requests are continuing in nature, up to and including the course of trial. Materials sought by these Requests that become available after you serve your responses must be disclosed to counsel for Plaintiff by supplementary response or responses.

12. Pursuant to Federal Rule of Civil Procedure 26(e), you are under a duty to promptly amend your responses to these Requests if you learn that an answer is in some material respect incomplete or incorrect. If you expect to obtain further information or expect the accuracy of a

response given to change between the time responses are served and the time of trial, you are requested to state this fact in each response.

13. If you contend that it would be unreasonably burdensome to obtain and provide all of the documents called for in response to any document request or any subsection thereof, then in response to the appropriate document request: (a) produce all such documents as are available to you without undertaking what you contend to be an unreasonable request; (b) describe with particularity the efforts made by you or on your behalf to produce such documents; and (c) state with particularity the grounds upon which you contend that additional efforts to produce such documents would be unreasonable.

14. The singular form of a noun or pronoun includes the plural form, and the plural form includes the singular.

15. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of a document production topic all responses that otherwise might be construed to be outside its scope.

16. A reference to an entity in this request shall be construed to include its officers, directors, partners, members, managers, employees, representatives, agents, consultants, and anyone acting on its behalf.

17. The document production topics apply to the period from 2016 through the present, unless otherwise limited or expanded by a particular topic description.

## **REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 1.** All documents and communications regarding any rationale(s) for drafting or enacting SB 1, SB 7, HB 3, or HB 6.

**REQUEST FOR PRODUCTION NO. 2.** All documents and communications regarding the implementation or enforcement of SB 1, SB 7, HB 3, or HB 6.

**REQUEST FOR PRODUCTION NO. 3.** All documents and communications regarding voter turnout, including patterns of voter turnout by racial or ethnic minorities, disabled persons, and partisan affiliation during the 2020 primary and general elections.

**REQUEST FOR PRODUCTION NO. 4.** All documents and communications regarding the impact or potential impact of SB 1, SB 7, HB 3, or HB 6 on particular demographics, including but not limited to racial or ethnic minorities, disabled persons, and party affiliation.

**REQUEST FOR PRODUCTION NO. 5.** All documents and communications regarding usage of the following methods of voting by racial or ethnic minorities and disabled persons, or by party affiliation, during the period from 2016 to present:

- (a) Drop-box voting;
- (b) Drive-thru voting;
- (c) 24-hour voting;
- (d) Straight-ticket voting;
- (e) Vote-by-mail;
- (f) Early voting;
- (g) Curbside voting;
- (h) All other methods of voting.

**REQUEST FOR PRODUCTION NO. 6.** All documents and communications regarding voter assistance, including transportation assistance and voting harvesting, and patterns of requests for voter assistance by race, ethnicity, disability status, or party affiliation during the period from 2016 to present.

**REQUEST FOR PRODUCTION NO. 7.** All documents and communications regarding the number or proportion of Texas residents, Texas citizens of voting age, or Texas registered

voters who have, or lack, a driver's license, election identification certificate, personal identification card, or social security number, including patterns by race, ethnicity, disability status, or party affiliation from 2016 to present.

**REQUEST FOR PRODUCTION NO. 8.** All documents and communications discussing actual or alleged illegal voting, election fraud, or other criminal conduct in connection with the following methods of voting during the period from 2016 to present:

- (a) Drop-box voting;
- (b) Drive-thru voting;
- (c) 24-hour voting;
- (d) Straight-ticket voting;
- (e) Vote-by-mail;
- (f) Early voting;
- (g) Curbside voting;
- (h) All other methods of voting.

**REQUEST FOR PRODUCTION NO. 9.** All documents and communications regarding the methods you took to secure, monitor, surveil, watch, or supervise the following methods of voting during the period from 2016 to present:

- (a) Drop-box voting;
- (b) Drive-thru voting;
- (c) 24-hour voting;
- (d) Straight-ticket voting;
- (e) Vote-by-mail;
- (f) Early voting;

- (g) Curbside voting;
- (h) All other methods of voting.

**REQUEST FOR PRODUCTION NO. 10.** All documents and communications regarding actual or alleged illegal voting, election fraud, or other criminal conduct in connection with voter assistance, including transportation assistance and vote harvesting, during the period from 2016 to present.

**REQUEST FOR PRODUCTION NO. 11.** All documents and communications regarding instances of actual or alleged violence, discrimination, harassment, intimidation, or inappropriate behavior from a partisan poll watcher, poll worker, or election judge, during the period from 2016 to present.

**REQUEST FOR PRODUCTION NO. 12.** All documents and communications regarding the purpose of forming the 2020 Ballot Fraud Intervention Team and the 2021 Texas Election Integrity Unit of the Office of the Texas Attorney General.

**REQUEST FOR PRODUCTION NO. 13.** All documents and communications related to voting practices, election administration, and voter turnout in Harris County.

**REQUEST FOR PRODUCTION NO. 14.** All documents and communications related to actual or alleged election fraud, illegal voting, and other criminal conduct relating to elections in Harris County.

**REQUEST FOR PRODUCTION NO. 15.** All documents and communications related to voting practices, election administration, and voter turnout in Bee County.

**REQUEST FOR PRODUCTION NO. 16.** All documents and communications related to actual or alleged election fraud, illegal voting, and other criminal conduct related to elections in Bee County.

**REQUEST FOR PRODUCTION NO. 17.** All documents and communications related to voting practices, election administration, and voter turnout in Bexar County.

**REQUEST FOR PRODUCTION NO. 18.** All documents and communications related to actual or alleged election fraud, illegal voting, and other criminal conduct relating to elections in Bexar County.

**REQUEST FOR PRODUCTION NO. 19.** All communications between you and the Texas Legislature regarding SB 1, SB 7, HB 3, and HB 6, including communications regarding the impacts or potential impacts of SB 1, SB 7, HB 3, and HB 6 on racial or ethnic minorities, disabled persons, and on voters by party affiliation.

**REQUEST FOR PRODUCTION NO. 20.** All communications between you and the Texas Governor regarding SB 1, SB 7, HB 3, and HB 6, including communications regarding the impacts or potential impacts of SB 1 on racial or ethnic minorities, disabled voters, and voters by party affiliation.

**REQUEST FOR PRODUCTION NO. 21.** All communications between you and the Texas Lieutenant Governor regarding SB 1, SB 7, HB 3, and HB 6, including communications regarding the impacts or potential impacts of SB 1, SB 7, HB 3, and HB 6 on racial or ethnic minorities and disabled voters, and on voters by party affiliation.

**REQUEST FOR PRODUCTION NO. 22.** All communications between you and the Texas Secretary of State regarding SB 1, SB 7, HB 3, and HB 6, including communications regarding the impacts or potential impacts of SB 1, SB 7, HB 3, and HB 6 on racial or ethnic minorities and disabled voters, and on voters by party affiliation.

**REQUEST FOR PRODUCTION NO. 23.** All documents and communications between you and local election officials regarding SB 1, SB 7, HB 3, and HB 6, including

communications regarding the impacts or potential impacts of SB 1, SB 7, HB 3, and HB 6 on racial or ethnic minorities and disabled voters, and on voters by party affiliation.

**REQUEST FOR PRODUCTION NO. 24.** All communications between you and the following third-party organizations, including any of their affiliates or subsidiaries, regarding SB 1, SB 7, HB 3, and HB 6, including communications regarding the impacts or potential impacts of SB 1 on racial or ethnic minorities and disabled voters, and on voters by party affiliation:

- (a) The Heritage Foundation
- (b) The Texas Public Policy Foundation
- (c) The American Legislative Exchange Council
- (d) The State Policy Network
- (e) Honest Elections Project
- (f) Public Interest Legal Foundation
- (g) American Civil Rights Union
- (h) Project Veritas
- (i) The Republican National Committee

Dated: November 29, 2021.

Respectfully submitted,

/s/ Sean Morales-Doyle

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